

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CANAL INSURANCE COMPANY

Plaintiff,

-against-

GINNETTI TRUCKING, LLC, a Connecticut Limited Liability Corporation, BRUCE LAURITZEN, individually, EDDYS N. GARCIA, as Administrator of the Goods, Chattels and Credits which were of WENDY SANTOS, deceased, EDDYS N. GARCIA, individually, EDDY I. GARCIA, an infant by his father and natural guardian, EDDYS N. GARCIA, KEINNY J. GARCIA, an infant by his father and natural guardian, EDDYS N. GARCIA, OLGA GARCIA, individually, RAFAEL SALVADOR, individually, KEYLIE SALVADOR, an infant by her mother and natural guardian, OLGA GARCIA, ANGEL RIVERA, individually, EDART LEASING COMPANY, LLC, a Massachusetts Limited Liability Corporation, and DASILVA TAUNTON EXPRESS, a Massachusetts business entity, form unknown,

08 CV 01588

MOTION TO ADMIT COUNSEL  
PRO HAC VICE

Defendants.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Raymond D. McElfish, a member in good standing of the Bar of this Court, hereby move for an Order allowing the admission pro hoc vice of Jeffrey C. Lynn.

Applicant's Name: Jeffrey C. Lynn  
Firm Name: McElfish Law Firm  
Address: 1112 N. Sherbourne Drive  
City/State/Zip: West Hollywood, CA 90069  
Phone Number: 310-659-4900  
Fax Number: 310-659-4926

JRC 925 6412305 FEB 15 2008

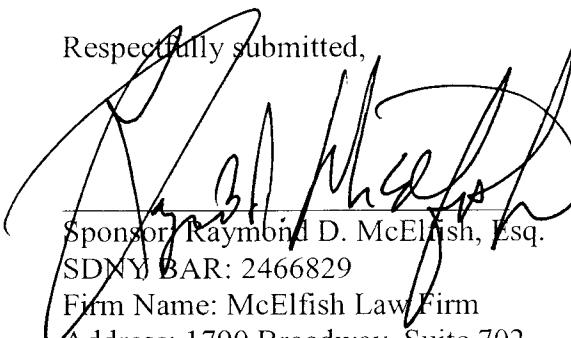
01/15/08  
10:15 AM  
CLERK'S OFFICE  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
100 WEST BROADWAY  
NEW YORK, NY 10013  
TEL: (212) 805-0100  
FAX: (212) 805-0101

Jeffrey C. Lynn is a member in good standing of the Bar of the State of California. There are no pending disciplinary proceedings against Jeffrey C. Lynn in any State or Federal court.

Dated:

City, State:

Respectfully submitted,

  
Sponsor: Raymond D. McElfish, Esq.  
SDNY BAR: 2466829  
Firm Name: McElfish Law Firm  
Address: 1790 Broadway, Suite 702  
City/State/Zip: New York, NY 10019  
Phone Number: 212-307-5100  
Fax number: 212-307-5200

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CANAL INSURANCE COMPANY

cv \_\_\_\_\_( )

Plaintiff,

-against-

GINNETTI TRUCKING, LLC, a Connecticut Limited Liability Corporation, BRUCE LAURITZEN, individually, EDDYS N. GARCIA, as Administrator of the Goods, Chattels and Credits which were of WENDY SANTOS, deceased, EDDYS N. GARCIA, individually, EDDY I. GARCIA, an infant by his father and natural guardian, EDDYS N. GARCIA, KENNY J. GARCIA, an infant by his father and natural guardian, EDDYS N. GARCIA, OLGA GARCIA, individually, RAFAEL SALVADOR, individually, KEYLIE SALVADOR, an infant by her mother and natural guardian, OLGA GARCIA, ANGEL RIVERA, individually, EDART LEASING COMPANY, LLC, a Massachusetts Limited Liability Corporation, and DASILVA TAUNTON EXPRESS, a Massachusetts business entity, form unknown,

Defendants.

08 CV 01588

AFFIDAVIT OF

RAYMOND D. McELFISH  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE

State of New York )  
 ) ss:  
County of New York )

Raymond D. McElfish, being duly sworn, hereby deposes and says as follows:

1. I am President of McElfish Law Firm, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Jeffrey C. Lynn as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice in 1992. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this court.
3. I have known Jeffrey C. Lynn since 2005.

4. Jeffrey C. Lynn is a senior associate at McElfish Law Firm in West Hollywood, California.
5. I have found Mr. Lynn to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Jeffrey C. Lynn, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Jeffrey C. Lynn, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Jeffrey C. Lynn, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated:

City, State:

Notarized:



Respectfully Submitted

Raymond D. McElfish, Esq.  
SDNY Bar Code: 2466829

A handwritten signature in black ink, appearing to read "Raymond D. McElfish". The signature is fluid and cursive, with some stylized lettering.

## ACKNOWLEDGMENT

State of California  
County of Los Angeles)

On DEcember 25, 2008 before me, Henrietta Kopecky, notary public  
(insert name and title of the officer)

personally appeared Raymond D. McElfish,  
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are  
subscribed to the within instrument and acknowledged to me that he/she/they executed the same in  
his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the  
person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing  
paragraph is true and correct.

WITNESS my hand and official seal.

Signature

(Seal)





**THE STATE BAR  
OF CALIFORNIA**

**MEMBER SERVICES CENTER**

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

January 15, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JEFFREY CHARLES LYNN, #97698 was admitted to the practice of law in this state by the Supreme Court of California on May 29, 1981; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature of Kath Lambert.  
Kath Lambert  
Custodian of Membership Records

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CANAL INSURANCE COMPANY

**08 CV 01588**

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-against-

GINNETTI TRUCKING, LLC, a Connecticut Limited Liability Corporation, BRUCE LAURITZEN, individually, EDDYS N. GARCIA, as Administrator of the Goods, Chattels and Credits which were of WENDY SANTOS, deceased, EDDYS N. GARCIA, individually, EDDY I. GARCIA, an infant by his father and natural guardian, EDDYS N. GARCIA, KENNY J. GARCIA, an infant by his father and natural guardian, EDDYS N. GARCIA, OLGA GARCIA, individually, RAFAEL SALVADOR, individually, KEYLIE SALVADOR, an infant by her mother and natural guardian, OLGA GARCIA, ANGEL RIVERA, individually, EDART LEASING COMPANY, LLC, a Massachusetts Limited Liability Corporation, and DASILVA TAUNTON EXPRESS, a Massachusetts business entity, form unknown,

MOTION TO ADMIT COUNSEL  
PRO HAC VICE  
ON WRITTEN MOTION

Defendants.

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Upon the motion of Raymond D. McElfish, attorney for Canal Insurance Company, and said sponsor attorney's affidavit in support;

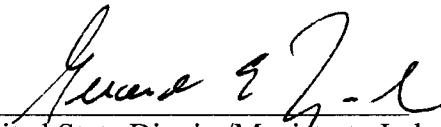
**IT IS HEREBY ORDERED** that:

Applicant's Name:	Jeffrey C. Lynn
Firm Name:	McElfish Law Firm
Address:	1112 N. Sherbourne Drive
City/State/Zip:	West Hollywood, CA 90069
Phone Number:	310-659-4900
Fax Number:	310-659-4926

Is admitted to practice pro hac vice as counsel for Canal Insurance Company in the above captioned case in the United States District Court for the Southern District of New York. All attorneys

appearing before this court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: Feb. 15, 2008  
City, State:

  
United States District/Magistrate Judge